

EXHIBIT 3

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION
3
4 KELLY WILSON,) Case No.
5 Plaintiff,) 3:14-CV-01441-VC
6 vs.)
7 THE WALT DISNEY COMPANY,)
8 DISNEY ENTERPRISES, INC.,)
9 WALT DISNEY PICTURES, and)
WALT DISNEY MOTION PICTURES)
GROUP, INC.,)
Defendants.)
11 _____)

CONFIDENTIAL

DEPOSITION OF PAUL BRIGGS
Burbank, California
Tuesday, January 20, 2015
Volume I

22 Reported by:
 ROCHELLE HOLMES
23 CSR No. 9482
24 Job No. 1995955
25 PAGES 1 - 162

16 Deposition of PAUL BRIGGS, taken on behalf of
17 Plaintiff, at 2100 Riverside Drive, Room 040, Burbank,
18 California, beginning at 1:05 p.m. and ending at 5:11
19 p.m. on Tuesday, January 20, 2015, before ROCHELLE
20 HOLMES, Certified Shorthand Reporter No. 9482, Certified
21 Realtime Reporter No. 0123.

1 Q So maybe you started storyboarding for Frozen
2 around August of 2011; does that sound right?

3 A Uh-huh, yes.

4 Q How did you get that position to create
5 storyboards for Frozen? Is it something you interviewed
6 for or because you were with the company, somebody just
7 chose you?

8 A It's because I'm with the company, that's why.
9 That's what I do. I'm a storyboard artist for the
10 company.

11 Q Okay. And does the director of Frozen, did
12 they select you or was it -- who decided that you would
13 work on Frozen?

14 MR. KLAUS: To your knowledge.

15 THE WITNESS: The directors, to my knowledge.

16 Q BY MS. BARTEAU: Is that Chris Buck, to your
17 knowledge, that made that decision?

18 A That would be -- at the time, it was Chris Buck
19 as well as the producer, Peter Del Vecho.

20 Q Have you ever worked at Pixar?

21 A No.

22 Q Do you know anyone who works at Pixar?

23 A Yes.

24 Q How many people do you know that work at Pixar?

25 A I would say ten people.

1 And Barry Johnson is a story artist.

2 Q Anybody else? I count nine. I'm not trying to
3 trick you or anything.

4 A No, I'm trying to think. Emma Coats as well,
5 E-M-M-A, C-O-A-T-S. She is a story artist as well.

6 Q How long have you known Ted Mathot?

7 MR. KLAUS: You can give your best approximation as
8 you sit here today.

9 THE WITNESS: Approximately six, seven years.

10 Q BY MS. BARTEAU: And how did you meet him?

11 A I met him at San Diego ComicCon.

12 Q Okay. How did you meet Ronnie del Carmen?

13 A San Diego ComicCon.

14 Q And how about Enrico Casarosa?

15 A The same.

16 Q Yeah? How about Derek Thompson, how long have
17 you known Derek?

18 A Derek I have known for a month.

19 Q How did you meet Derek?

20 A Derek, I went up to visit Pixar, I met him up
21 there a month ago.

22 Q Why did you go visit Pixar a month ago?

23 A It was for a talk on Big Hero 6.

24 Q Did you work on Big Hero 6?

25 A I did.

1 Q Outside of work or?

2 A Through work.

3 Q Through work. Did you meet through a friend
4 who also works at Pixar?

5 A No.

6 Q So I want to talk about your work on Frozen,
7 since that's why we are all here today. Specifically,
8 the Frozen teaser trailer. So you said that you were
9 head of story. Is that also -- is that true for the
10 teaser trailer as well?

11 A Yes.

12 Q Did you have anybody who reported to you while
13 working on the Frozen teaser trailer?

14 A Yes.

15 Q Who?

16 A That would be the story crew.

17 Q And how many people comprise the story crew?

18 A That were just on the teaser or on the film?

19 Q Let's just talk about the teaser.

20 A Just the teaser, I would have to list them off.

21 MR. KLAUS: You can go ahead and list them off.

22 THE WITNESS: Okay. That would be Raymond Percy,
23 Don Dougherty, Nicole Mitchell, Mark Smith, Jeff Ranjo.
24 I'm trying --

25 MR. KLAUS: Those are the ones that come to mind?

1 MR. KLAUS: Object to the form of the question,
2 compound, vague and ambiguous.

3 THE WITNESS: Specifically for, like, what? What
4 do you mean as far as what are we looking for for
5 inspiration?

6 Q BY MS. BARTEAU: For example, if you are going
7 to storyboard a snowman, would you look on the internet
8 to see what other snowmen you find on the internet?

9 A No.

10 MR. KLAUS: Object to the form of the question.

11 You can answer.

12 THE WITNESS: No, I would not.

13 Q BY MS. BARTEAU: What if you are looking for a
14 reindeer, so something that is real; right? Would you
15 look at -- look on the internet for pictures of real
16 reindeer as a reference in creating that character?

17 MR. KLAUS: Object to the form of the question.

18 You can answer if you understand it.

19 THE WITNESS: Only when referencing how to draw
20 them, anatomy, proportion, scale, but never for
21 character or story.

22 Q BY MS. BARTEAU: Do you ever go on YouTube?

23 MR. KLAUS: Ever? For any purpose?

24 MS. BARTEAU: Yes.

25 MR. KLAUS: Or for the purposes that he's talking

1 about; anatomy, proportion, scale.

2 Q BY MS. BARTEAU: Do you ever go on YouTube?

3 A Yes.

4 Q Do you ever use YouTube for inspiration for the
5 work you do in storyboarding or creating a story?

6 MR. KLAUS: Object to the form of the question.

7 You can answer if you understand the question.

8 THE WITNESS: No.

9 Q BY MS. BARTEAU: Do you ever look at Vimeo?

10 MR. KLAUS: Same objection.

11 THE WITNESS: Can you clarify, specifically for?

12 Q BY MS. BARTEAU: Just ever. Do you ever go on
13 Vimeo?

14 A Yes.

15 Q Do you ever look on Vimeo for inspiration for
16 your work?

17 MR. KLAUS: Object to the form of the question.

18 You can answer if you understand it.

19 THE WITNESS: I don't necessarily understand it.
20 Specifically to?

21 Q BY MS. BARTEAU: For your work as head of story
22 or storyboard artist?

23 A No.

24 Q So specifically in creating Frozen and the
25 Frozen teaser trailer, what did you use? Did you use

1 Q Okay. And then are the notes -- how are they
2 distributed to people after the meeting?

3 A In this case, I'm not sure who they were
4 distributed to; but usually they are distributed in the
5 form of an e-mail to whoever needs to receive them.

6 Q Okay. Are they usually sent on the same day of
7 the meeting, to the best of your recollection?

8 A For the Frozen teaser specifically?

9 Q For the Frozen teaser trailer.

10 A That I don't know, to my recollection. I don't
11 remember if I received them the day of or the day after
12 or two days after.

13 Q Okay. Who was in charge of making the final
14 creative decisions on the teaser trailer?

15 A That would be John Lasseter. And then I would
16 also include Chris Buck and Jennifer Lee in that.

17 Q How much was John Lasseter involved in the
18 creation of the teaser trailer?

19 A He was very involved.

20 Q What do you mean by that?

21 A Well, he helps brainstorm and develop the idea
22 with everybody.

23 Q Do you remember what his contributions were to
24 the brainstorming sessions?

25 A For the teaser trailer?

1 your job at Disney?

2 A No.

3 MR. KLAUS: Object to the --

4 THE WITNESS: Sorry.

5 MR. KLAUS: I was going to object to the form of
6 the question. You answered it.

7 Q BY MS. BARTEAU: So no e-mails between you or
8 your crew about development of the teaser trailer; is
9 that correct?

10 MR. KLAUS: If you recall, Mr. Briggs.

11 THE WITNESS: No. Specifically between artists,
12 no.

13 Q BY MS. BARTEAU: Did you communicate with
14 anybody by e-mail about the development of the teaser
15 trailer?

16 A Whoever was taking the notes from those
17 meetings, when those e-mails are sent. That's the only
18 communication.

19 Q Okay. And if you recall, who decided that Olaf
20 and Sven should be the stars or the characters featured
21 in the teaser trailer?

22 A I don't recall who specifically thought they
23 would be good for the teaser.

24 Q Did John Lasseter have the final decision in
25 development of the teaser trailer?

1 MR. KLAUS: Which aspect?

2 Q BY MS. BARTEAU: In any aspect of the teaser
3 trailer?

4 A Yes.

5 Q Let's get to these brainstorming notes.

6 A Okay.

7 Q This is previously marked as Exhibit 6.

8 (The aforementioned document was previously
9 marked as Exhibit 6 by the court reporter.)

10 Q BY MS. BARTEAU: If you would look at Page 1 of
11 this packet of documents, which is Bates stamped WDP 1
12 and going through 40.

13 Have you seen this before?

14 A Yes.

15 MR. KLAUS: Do you mean the January 7th e-mail?

16 Q BY MS. BARTEAU: Yes. January 7th, 2013.

17 MR. KLAUS: So Pages 1 through 4.

18 THE WITNESS: Yes.

19 Q BY MS. BARTEAU: What is this that we're
20 looking at?

21 A These are teaser brainstorm notes.

22 Q And would these be notes taken at a meeting
23 where you are brainstorming ideas for the Frozen teaser
24 trailer?

25 A Yes.

1 Q Were these notes from the very first meeting
2 regarding the brainstorming ideas for the Frozen teaser
3 trailer?

4 A That I was involved in, yes.

5 Q Are you aware of any meeting prior to this?

6 A No.

7 Q You see at the top of the page where in the
8 "To" field of the e-mail it says Paul Briggs and it's --
9 the e-mail address, that's you, right, that it's
10 referring to?

11 A Yes.

12 Q Okay. So paul.briggs@disney.com. Why is your
13 e-mail address listed as disney.com instead of
14 disneyanimation.com here?

15 A I don't know.

16 Q Do you know if they are interchangeable like if
17 you send one to Disney Animation, do you receive it --

18 A Best of my knowledge, if you send it to
19 paul.briggs@disney.com, it also goes to my Disney
20 Animation.

21 Q Okay. You probably already answered this, but
22 do you recall being at this meeting?

23 A Yes.

24 Q Okay. Do you recall if anybody else was at
25 this meeting besides the people listed in the e-mail who

1 What does that mean?

2 A This means that we have a meeting with John
3 Lasseter and we are going to pitch him these ideas that
4 we have been developing.

5 Q Okay. And to your knowledge, is this the first
6 meeting that John has been involved in brainstorming the
7 teaser trailer?

8 A Yes.

9 Q Do you know if he was involved in any way in
10 creating or brainstorming ideas for the teaser trailer
11 prior to this meeting?

12 A No.

13 Q Do you recall where this meeting was held?

14 A I believe it was in our Frozen story room. The
15 exact room number, I couldn't tell you.

16 Q Did you always hold the meetings in the same
17 place?

18 A For the teaser?

19 Q Yes.

20 A No. They were always within Disney Animation
21 Studios.

22 Q Here in Burbank?

23 A Here in Burbank, yes.

24 Q So this first paragraph says, "JL, I would love
25 to get one thing where Olaf's got the twig in his

1 "1/18/13 teaser beats notes." I'm just wondering if
2 there is any difference in terms of the meeting that
3 day?

4 A It's the same -- it's the same idea. We are
5 going to brainstorm what we have done as the ideas
6 evolved out of this meeting. And based off of that, you
7 know, brainstorming session, we kind of came together on
8 an idea. And now we are going to take that idea and
9 continue to brainstorm it into the next -- next session.

10 Q First line of Page 11, "PB" -- I assume that is
11 you; is that correct?

12 A Yes.

13 Q It says, "See Olaf walking in, trundle step,
14 comes upon a patch of flowers, smells it, sneezes, and
15 his nose flies off onto a frozen lake. Looks up and
16 sees Sven on the other side. Both work their way toward
17 the carrot. Who is going to get there first? Need the
18 button."

19 Is that -- do you recall is that an idea that
20 you proposed at the beginning of the meeting?

21 A What this is, this is coming from out of our
22 last meeting of what John pitched where we all came to
23 this idea of, like, this is what we want our teaser to
24 be. And this is what -- again, just kind of recounting
25 what we all came out of the meeting, it's kind of

1 setting the context for this meeting of, here is the
2 idea we are all moving forward with.

3 Q Okay.

4 MR. KLAUS: When you said coming out of the last
5 meeting of what John pitched, do you mean the meeting
6 where we pitched John?

7 THE WITNESS: Sorry. Yes. Where we pitched John
8 all of those ideas and then brainstormed and then kind
9 of landed on, you know -- after the brainstorming --

10 MR. BAER: So you were referring to the meeting of
11 the 15th of January.

12 THE WITNESS: The pitch to JL notes.

13 MR. KLAUS: January 15th?

14 THE WITNESS: Yes.

15 Q BY MS. BARTEAU: All right. Let's look at the
16 storyboards that are dated January 19th, 2013,
17 previously marked as Exhibit 8.

18 (The aforementioned document was previously
19 marked as Exhibit 8 by the court reporter.)

20 Q BY MS. BARTEAU: These are numbered WDP 61
21 through 65.

22 A Yes.

23 Q Did you create all these storyboards?

24 A I did. Sadly, these are all very ugly
25 drawings. The ugliest drawings I've ever done, but

1 these are my drawings.

2 MR. KLAUS: I think they are good.

3 THE WITNESS: No, they are very bad. I drew them
4 all over the weekend.

5 Q BY MS. BARTEAU: And what was the inspiration
6 for these storyboards?

7 MR. KLAUS: Object to the form. Do you mean what
8 was the purpose in drawing them?

9 MS. BARTEAU: No, I don't mean the purpose.

10 Q BY MS. BARTEAU: How did you create them?
11 Where did you get the ideas from that are reflected on
12 the storyboards?

13 A Coming out of our January 15th meeting and
14 being involved in that meeting and hearing all the
15 thoughts and ideas, I then -- and where we all landed on
16 what we wanted to see in a teaser, I storyboarded this.

17 Q So based on seeing the final published version
18 of the teaser trailer, it looks like this is pretty much
19 the storyboard that is reflected in the final teaser
20 trailer. There might be -- you know, I know that there
21 was edits, but would you agree that this is generally
22 the story that appeared in the teaser trailer?

23 MR. KLAUS: Do you want to see the teaser trailer?

24 THE WITNESS: I do know a lot of brainstorming
25 occurred after even we saw this, there was still a lot